

## REMARKS

As a preliminary matter, the Applicant has attended to correcting the errors noted in the drawing objections. In particular, reference number 312 refers to a port, as indicated on page 4, line 6. Consequently, in Fig. 3, this reference numeral has been added to indicate the port. The use of 312 in connection with a sidewall on page 4, line 22 was a typographical error. The sidewall is indicated by reference numeral 313. Appropriate correction has been made to the specification and this number added in Fig. 2. Support for the addition of the number 313 in Fig. 2 may be found in Fig. 3. Use of the number 314 in connection with the bottom wall on page 4, line 24, was an error, and this number has simply been removed. Additional typographical errors noted by the Applicant and corrected by way of amendment are as follows:

On page 1, lines 16 and 20, a hyphen has been inserted between the words "dirt" and "laden".

On page 2, line 2, a comma has been inserted after the first occurrence of the word "wall".

On page 2, lines 2 and 7, a hyphen has been inserted between the words "dirt" and "laden".

On page 2, line 3, the first occurrence of the word "any" has been replaced with the word "and".

On page 2, line 11, a space has been inserted between the words "understanding" and "of".

On page 2, line 14, the semicolon after the word "system" has been replaced by a comma.

On page 3, line 3, "is 10" has been corrected to read "10 is".

On page 3, line 4, the first occurrence of the word "an" has been changed to "any".

On page 3, line 4, a comma has been inserted between the words "appliance" and "including".

On page 3, line 9, a space has been inserted between the words "floor" and "care".

On page 3, line 11, "FIG. 3" has been corrected to state "FIG. 2".

On page 3, line 10, the comma has been deleted.

On page 3, line 11, "(FIG. 3)" has been corrected to read "(FIG. 2)"

On page 3, line 12, "not shown" has been deleted and replaced with "FIG. 2".

On page 3, line 18, reference to "M1" has been removed.

On page 3, line 14, "dirt collecting assembly 300" has been corrected to read "dirt collecting and filtration system 300".

On page 3, lines 15-16, "particle filtration and collecting system 300" has been corrected to read "dirt collecting and filtration system 300".

On page 3, line 16, the space between the words "air" and "stream" has been deleted.

On page 3, line 18, "M1" has been deleted.

On page 3, line 20, the word "to" has been inserted between the words "now" and "FIGS."

On page 3, line 21, "and filtration" has been inserted between both occurrences of the words "collecting" and "system".

On page 4, line 1, the reference numeral "312" used in connection with an interior portion has been replaced with reference number "314A". This reference number was added in Fig. 2.

On page 4, line 4, reference number "322" in connection with a filter member has been corrected to indicate the reference number "320".

On page 4, lines 6, 13, 18, and 20, a hyphen has been inserted between the words "dirt" and "laden".

On page 4, line 9, a comma has been inserted between the words "means" and "including".

On page 4, line 13, a comma has been inserted immediately after the number "330".

On page 4, line 23, upper chamber area was mistakenly referred to by the number "307". This number has been replaced with the correct number "306". In the drawings, the upper chamber was mistakenly referred to with the number "312" in Fig. 3. This number has been replaced by the number "306".

On page 4, line 24, reference to "motor-fan assembly M1" has been corrected to indicated "motor-fan assembly M2".

On page 5, line 1, the suction inlet was mistakenly referred to by the number "314".

This number has been replaced with the correct number "311".

On page 5, line 4, a hyphen has been inserted between the words "dirt" and "laden".

On page 5, line 6, the suction inlet was mistakenly referred to by the number "310".

This number has been corrected to indicate "210".

On page 5, line 17, the second chamber was mistakenly referred to by the number "306". This has been corrected to indicate the number "304".

On page 5, line 9, the second occurrence of the word "a" has been deleted.

On page 5, line 12, the word "allows" has been corrected to read "allow".

On page 5, line 16, the second occurrence of the word "dust" has been deleted.

On page 5, line 17, the numeral "306" has been corrected to read "304".

On page 5, line 23, the direction arrow was mistakenly indicated by the number "900". This has been corrected to indicate the correct number "600".

On page 6, line 2, suction motor was mistakenly referred to by "M1". This has been corrected to indicate the correct number "M2".

On page 6, line 3, the words "interior section" have been replaced by the words "elongated portion".

On page 6, line 4, a comma has been inserted immediately after the numeral "320".

In the drawings, in Fig. 2, reference number 130 has been added to indicate the wheels as described on page 3, line 12 of the specification.

Reference number 304 was added in accordance with page 4, line 19 of the specification. In Fig. 3, the number 325 was mistakenly used to refer to the motor assembly used to turn the filter. To make the drawings consistent with the specification, reference number 400 has been substituted for 325 in this Figure. As in Fig. 2, reference number 304 has been added to indicate the lower chamber as described on page 4, line 19. Also, the mistaken reference of the upper chamber 306 with the number 312 has been corrected as noted above. Also, the incorrect reference to the valve with the number 314 has been corrected to indicate the number 316.

In Fig. 2, reference to numbers 700 and 800 have been removed. In Fig. 3, the reference to number 215 is supported by the specification on page 3, line 18. In Fig. 4, reference to the number 321 for the partitions within the filter have been removed.

In the claims, the Applicant has attended to the claim objections noted by the Examiner. In particular, in claim 1, line 7, "adjacent one" has been corrected to state "adjacent to one". Also, in claim 1, line 9, references to "said filter" have been corrected to state "said filter member", making them consistent with remainder of the claim.

In claim 2, line 2, the word "member" has been inserted after the word "filter" to make this claim consistent with claim 1. Also, the Applicant has attended to the mis-worded Markush terminology by removing the word "of" in line 2 and inserting "selected from". No change in the claim's scope was made in making this amendment.

Turning to the substantive rejections, the Examiner has rejected claims 1, 3, and 4 as obvious over U.S. Patent No. 6,458,178 to Dietz in view of U.S. Patent Application No. 2004/0129649 to Vanhoutte. The Applicant respectfully disagrees because there is no motivation for combining these patents in the manner suggested by the Examiner. Moreover, the resulting combination would not disclose the invention as claimed.

In particular, Dietz and Vanhoutte represent widely different approaches to the same problem of removing build-up on a filter. Dietz discloses a circular element having two filter segments mounted thereon with internal partitions defining separate chambers interiorly of each filter segment. Dietz also includes a pivoting flapper valve that has arms extending outwardly from the center of the circular element into each chamber that selectively control the flow of air so that air entering through a filter segment is directed to an exhaust port, or when the segment is in an unused position, air is directed from the interior of the chamber to blow outwardly through a filter segment to remove dust and debris therefrom. Due to the internal flapper valve arrangement and the need for the exhaust and inlet ports, only a quarter of the circumference of Dietz's circular element is used for filtration at one time. The Applicant's invention significantly improves upon Dietz by using a valve located at one end of the filter, such that substantially the entire circumference may be used for filtration purposes.

Vanhoutte is materially different from Dietz in that it is a liquid filtration system where the filtered liquid fills the interior of the cylindrical filter drum, such that the hydrostatic pressure created

by the liquid drives the filtration process. In this way, the build-up of debris on the filter is located on the interior side of the cylinder. An external sprayer is located above the filter drum opposite a catch basin located on the interior of the filter drum to dislodge debris as the drum rotates past the sprayer.

Because Dietz relies on the internal flapper valve to control the flow of air used to dislodge debris on the exterior side of its filter, one of ordinary skill would not consider incorporating an apparatus for rotating the filter member from Vanhoutte because it is unnecessary and would not contribute to the cleaning of the filter in Dietz. In terms of the processes for removing debris from the filter shown in Dietz and Vanhoutte, they are mutually exclusive and teach away from each other in this regard. Consequently, the Applicant believes that one of ordinary skill would not be motivated to combine these teachings as suggested by the Examiner.

In addition, even if one of ordinary skill were motivated to combine these teachings, they would not arrive at the claimed invention because neither Dietz nor Vanhoutte disclose a valve located adjacent one end of the filter member for allowing suction to be applied to selected portions of the filter. As discussed above, Dietz incorporates an internal flapper valve that channels air from air passages formed on either side of the two filter elements. There is no suggestion within Dietz that the valve be located adjacent one end of the filter member. Vanhoutte does not include any valve arrangement, and, thus, the combination of Dietz and Vanhoutte fail to disclose all of the limitations of the claimed invention. Consequently, the Applicant respectfully requests reconsideration of the rejection of claims 1, 3, and 4.

With respect to claim 2, since this rejection relies on application of Dietz in view of Vanhoutte as described with respect to claims 1, 3, and 4 above, the Applicant believes that this rejection is moot in view of the foregoing argument. Also, the Applicant believes that one of ordinary skill would not be motivated to incorporate an electric motor in Dietz for the same reasons as stated above. In particular, since Dietz relies on airflow to control operation of the flapper valve, a motor is not necessary. Moreover, as discussed above, rotation of the filter member in Dietz is likewise undesirable in view of the satisfactory filtration system disclosed therein that does not rely on rotation of the filter member to remove dust and debris therefrom. Therefore, the Applicant respectfully requests reconsideration of this rejection as well.

New claim 5 directed to the previously unclaimed blocking element feature has been presented for the Examiner's consideration. Support for this claim may be found on page 5, lines 22-page 6, line 7 and Figs. 3-4. No new matter has been added.

In view of the foregoing response, the Applicant believes that claims 1-5 are in condition for allowance and earnestly requests notice of the same.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Shannon V. McCue', is written over a horizontal line.

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